

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

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JD ELLIS, Individually and on Behalf	:	
of All Other Persons Similarly Situated,	:	Civil Action: 5:21-cv-308-F
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
LOVE’S TRAVEL STOPS & COUNTRY	:	
STORES, INC.	:	
	:	
Defendant.	:	
	:	
-----	X	

**CROSS-MOTION TO INVALIDATE ARBITRATION AGREEMENTS AND
FOR A PROTECTIVE ORDER ENJOINING DEFENDANT FROM
FURTHER IMPROPER COMMUNICATIONS**

Plaintiff JD ELLIS, together with all opt-ins (collectively “Plaintiffs”) moves this Court, for an Order declaring the Arbitration Agreements obtained during the pendency of this action as unenforceable as to the claims asserted in this litigation, issuance of a protective order enjoining the Defendant from further improper communications, as well as such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs shall rely upon the Memorandum of Law in Response to Defendant’s Motion to Dismiss and Compel Arbitration [Dkt. No. 20], and Plaintiffs’ Cross Motion to Invalidate Arbitration Agreements and for a Protective Order Enjoining Defendant from Further Improper Communications, together with the attached Exhibits 1-3.

Dated: July 9, 2021
Tulsa, Oklahoma

Respectfully submitted,

By: /s/ J. David Jorgenson

J. David Jorgenson

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**pro hac vice application forthcoming*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on July 9, 2021, I caused to be served a true copy of this document on all counsel of record via the Court's Electronic Case Filing System.

Dated: July 9, 2020
New York, NY

/s/ J. David Jorgenson
J. David Jorgenson, Esq.